

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

MICHAEL BAZZREA, et al.

Plaintiffs

v.

**ALEJANDRO MAYORKAS, et
al.**

Defendants.

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CA No. 3:22-cv-00265

**HANNAH ALLEN,
LARS ANDERSON,
CASSIDY ANDREWS,
DAVID ANDRIZZI,
CHAD ATWOOD,
MICHAEL BANNON,
RACHEL BECKWITH,
JAMES BERRY,
EILEEN BEST,
MARC BLOCK,
DARREL BOYLES,
CHRISTIAN BREWER,
JEFFERY BROOM,
NICHOLAS BROZUSKY,
MARK BYRD,
HEATHER CALDWELL,
JOSH CANDELARIA,
DAVID CARRIER,
KYLE CARTER,
RICHARD CHAPMAN,
NATHAN CHATWIN,
MICHAEL CHYNOWETH,
ALEXIS COLASURDO,
BRENNEN COLES,
BRANDON COLLINS,
JAMES COPELAND,
CHAD COPPIN,**

**BENJAMIN COUTTS,
ALAN CRAWFORD,
RYAN CURRY,
ZACHARY CURRY,
NOAH DENEND,
CHRISTOPHER DEVINE,
ANTONIO DIAZ,
PAUL DIEDRICKS,
STEPHANIE DIEDRICKS,
ANDREW DONADIO,
NICOLE EDWARDS,
KENNEDY EILERMAN,
KALENA EXNER,
MICHAEL FAMBRO,
JAMES FIELDER,
BRANDI FLINN,
BERLIN GABRETTI,
LUKE GALAT,
JOHN GARLAND,
BRANDON GAROFALO,
LAURA GAROFALO,
DAN GOMEZ,
COLLEEN GRIFFIN,
AMY HALEY,
JOSH HANDELAND,
RICHARD HARDWICK,
CHRISTOPHER HARKINS,
JOSHUA HARRIS,
DANIEL HAUSER,
JAMES HEAD,
CRAIG HERMILLER,
MICHAEL HERNON,
SEAN HILL,
JOSHUA HUDSON,
SHANGO INDOMITUS,
CONNOR JEANNERET,
IAN JOBS,
EARL JOHNSON,
JESSIE JOHNSON,
RICHARD JOY,
COURTNEY KEITH,**

**LAURIE KENNEDY,
JONG KIM,
JODIE KNOX,
BRIAN KUDRLE,
KELCIE LAROCHE,
ANDREW LARSEN,
JOHN LAZEAR,
ALINA LEHMAN,
GEORGETTE LOPEZ,
HEMAN MADRID,
HAL MARTIN,
ELIZABETH MASTORIDES,
CHARLES MATHIS,
JACKSON MCGINNIS,
CHRISTOPHER MEEDEL,
JAMES MERRILL,
CALEB MILLER,
ZACHARY MORAND,
DANIEL MORRISEY,
EMILY MUHLENBECK,
JUSTIN MUNK,
ANDRE MURPHY,
CORLEY MYRES,
MARGARET NAKOA,
MATTHEW NEWKIRK,
SHANE NOLAN,
NICHOLAS POEHLER,
MATTHEW POWERS,
MICHAEL PRICE,
CASEY REYNOLDS,
TYLER REYNOLDS,
BETTINA RICHARDSON,
EDWARD RICHARDSON,
CHRISTOPHER ROBERTS,
RICARDO RODRIGUEZ-
VALENTIN,
SHELBY RODRIGUEZ,
ROBERT ROGERS,
HEATHER SANDS,
ROBY SCHERLER,
BRETT SCHMITT,**

**A.J. SCHUR,
RYAN SHAW,
ZACHARY STETZEL,
PARKER SUBLETTE,
ZACH SULLIVAN,
JASON THORNE,
JEFFREY TUCKER,
SKYLER VYSE,
JASON WALLACE,
CHARLES WATSON III,
BRADLEY WEIKERT,
JACOB WHARTON,
JACOB WHITE,
TYLER WILKINSON,
STEVEN WOJICK,
TABITHA WOOLERY,**

Intervening Plaintiffs

v.

**ALEJANDRO MAYORKAS, in
his official capacity as
Secretary of the U.S.
DEPARTMENT OF
HOMELAND SECURITY,**

**LINDA L. FAGAN, in her
official capacity as
Commandant of the UNITED
STATES COAST GUARD,**

**LLOYD AUSTIN, in his official
capacity as Secretary of the
U.S. DEPARTMENT OF
DEFENSE,**

**JANET WOODCOCK, in her
official capacity as Acting
Commissioner of the U.S.**

**FOOD AND DRUG
ADMINISTRATION,**

Defendants.

**MOTION FOR LEAVE TO FILE
ADDITIONAL PLAINTIFFS' MOTION TO INTERVENE**

Pursuant to Rule 24 of the Federal Rules of Civil Procedure (“FRCP”), 125 Plaintiffs respectfully move this honorable Court to be allowed to file a Motion to Intervene in the above-captioned action. The Additional plaintiffs are (1) all members of the Coast Guard, and (2) all subject to the Department of Defense’s (DOD) and Coast Guard Vaccine Mandate.¹

The additional Plaintiffs are all equally-situated as the named plaintiffs with respect to the DOD and Coast Guard Mandate, and all are pursuing the same exact legal claims and remedies against the Defendants as the original Plaintiffs in this action. *See* ECF #1.

Counsel have complied with the meet and confer requirement in Local Rules and the government has not taken a position on the additional Plaintiffs’ motion. Both the movants’ counsel and defendants’

¹ One place, Jeffrey Tucker, is no longer subject to the mandate as he was recently discharged on June 13, 2022. He pursues all relief available as someone discharged in spite of his sincerely sought after religious accommodation and is more than 14 years of honest and faithful service. He seeks an adjudication of his rights that could allow him to re-enlist or obtain appropriate relief by a favorable judicial decision.

counsel have discussed their legal positions regarding the substantive and procedural aspects of the motion and the collateral, practical consequences that generates the need for this motion.

WHEREFORE, the additional 125 Plaintiffs pray this honorable Court will grant this Motion and allow these members of the Coast Guard to Intervene and join the action on an equal footing as their named plaintiff colleagues.

Dated: Aug. 11, 2022

Respectfully submitted,

/s/ Travis Miller

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/s/ Brandon Johnson

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/s/ Dale Saran

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(PHV Motion Pending)

Attorneys for the Plaintiffs

CERTIFICATE OF SERVICE

This 11th day of August, 2022, the foregoing Plaintiffs' Motion was
e-filed using the CM/ECF system.

/s/ Dale Saran

Dale Saran